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*InterDigital, Inc., InterDigital VC Holdings, Inc.,*  
*InterDigital Madison Patent Holdings, SAS, and*  
*InterDigital CE Patent Holdings, SAS*

**IN THE UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION**

INTERDIGITAL, INC.; INTERDIGITAL  
 VC HOLDINGS, INC.; INTERDIGITAL  
 MADISON PATENT HOLDINGS, SAS,  
 AND INTERDIGITAL CE PATENT  
 HOLDINGS, SAS,

Plaintiffs,

v.

THE WALT DISNEY COMPANY;  
 DISNEY MEDIA AND  
 ENTERTAINMENT DISTRIBUTION  
 LLC; DISNEY DTC LLC; DISNEY  
 STREAMING SERVICES LLC; DISNEY  
 ENTERTAINMENT & SPORTS LLC;  
 DISNEY PLATFORM DISTRIBUTION,  
 INC.; BAMTECH, LLC; HULU, LLC;  
 AND ESPN, INC.,

Defendants.

**Case No. 2:25-cv-00895-WLH-BFM**

**PLAINTIFFS' NOTICE OF  
 MOTION AND MOTION TO  
 DISMISS DEFENDANTS'  
 BREACH OF CONTRACT  
 COUNTERCLAIMS**

Hearing Date: May 30, 2025  
 Hearing Time: 1:30 p.m.  
 Courtroom: 9B  
 Judge: Honorable Wesley L. Hsu

Complaint Filed: Feb. 2, 2025  
 Trial Date: Not Set Yet

**TO DEFENDANTS' AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE THAT, at 1:30 p.m. on May 30, 2025, in the courtroom of the Honorable Wesley L. Hsu located at the First Street Courthouse, 350 West First Street, Los Angeles, CA 90012, in Courtroom 9B, Plaintiffs InterDigital, Inc., InterDigital VC Holdings, Inc., InterDigital Madison Patent Holdings, SAS, and InterDigital CE Patent Holdings, SAS (collectively, "Plaintiffs" or "InterDigital"), will respectfully move this Honorable Court to dismissing Counterclaims 1-4 filed on March 31, 2025 by Defendants The Walt Disney Company; Disney Media and Entertainment Distribution LLC; Disney DTC LLC; Disney Streaming Services LLC; Disney Entertainment & Sports LLC; Disney Platform Distribution, Inc.; BAMTech, LLC; Hulu, LLC; and ESPN, Inc. (collectively, "Disney" or "Defendants") (Dkt. 42), with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure on the grounds that the counterclaims fail to state a claim against the Plaintiffs upon which relief may be granted.

Plaintiffs base this Motion upon this Notice of Motion, the attached Memorandum of Points and Authorities, and exhibits thereto, the pleadings, documents, and records on file in this case, all other matters judicially noticeable, such further papers as may be filed in connection with this Motion, and on any further documentary evidence or oral argument as this Court may permit.

This Motion is made following the conference of counsel (by video) pursuant to L.R. 7-3, which took place on April 21, 2025.

1 Dated: April 28, 2025

Respectfully submitted,

2 /s/ Richard Kamprath

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